

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: LATISHA DEVEAUX : CHAPTER 13
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DEBTOR : Bankruptcy No. 19-16654

MOTION TO ABATE PAYMENTS AND MODIFY PLAN POST-CONFIRMATION

LATISHA DEVEAUX, through her attorney, Zachary Perlick, Esquire, hereby moves for an Amendment of her Chapter 13 Plan Post-Confirmation, and sets forth in support thereof the following:

1. Debtor filed a Chapter 13 Petition on October 24, 2019; the Chapter 13 plan was confirmed on June 2, 2020.
2. Debtor lost income and fell behind in her payments to the trustee and mortgagee. Debtor's daughter was ill and diagnosed with COVID-19 on April 25, 2020. She was unable to contribute to the household income.
3. Debtor will cure the post-petition amounts due to the Trustee over the remainder of the Plan as called for in the Modified Plan which is being filed concurrently with this Motion.
4. Debtor's confirmed plan required payments of \$402.00 each month for 54 months (months 7-60). Debtor's Modified Chapter 13 Plan requires payments of \$50.00 each month for the next 4 months followed by payments of \$470.00 for 45 months.

Wherefore, Debtor requests that her Motion to Abate Plan Payments and Motion to Amend Plan Post-Confirmation be Granted.

Respectfully submitted,

/Zachary Perlick/
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